



**SOUTHERN OREGON'S PREMIER
THEATRE & DINING EXPERIENCE**

Monday, 10/9/17

Chairman Ajit Pai
Commissioner Mignon Clyburn
Commissioner Michael O'Rielly
Commissioner Brendan Carr
Commissioner Jessica Rosenworcel

c/o Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: ET Docket No. 14-165 and GN Docket Nos. 12-268 and 14-166 Via Electronic Filing

Dear Chairman Pai, Commissioner Clyburn, Commissioner O'Rielly, Commissioner Carr, Commissioner Rosenworcel, and Ms. Dortch,

On behalf of the Oregon Cabaret Theatre, located in Ashland, Oregon, that provides approximately 265 performances per year to over 27,000 audience members, I write with concern about available spectrum and protection for our wireless microphones and backstage communications devices.

Since the Oregon Cabaret Theatre opened on August 1, 1986, OCT has become a vital part of Ashland's entertainment scene and a major attraction for visitors. OCT is unique in its elegant and friendly ambience and in the high quality of its productions, fine dining, and service. We produce 5 full productions a year, as well as Cabaret nights, live music, and Late Night Shows beginning in February and running through New Year's Eve. Our goal is to provide our patrons with a delightful and delicious entertainment experience.

OCT's Mission is to present first-rate theater entertainment in our unique theater-restaurant setting. We are committed to presenting a broad range of entertainment featuring top-quality performers and excellent production values. We are also committed to the development and presentation of new works in theater.

We strongly support the Commission's proposal to expand Part 74 license eligibility to include persons and organizations that can demonstrate the need for professional, high-quality audio and have the capability of providing it through conscientious use of wireless microphones. We support and endorse the Comments filed in these dockets by The Performing Arts Wireless Microphone Working Group.

Professional performing arts organizations hold thousands of performances each year, and wireless microphones are essential to producing high-quality performances while mitigating significant public safety concerns. Professional wireless capability, with successful interference protection, is essential to our sector.

The Oregon Cabaret Theatre typically uses between five and thirteen wireless microphones per performance, February through December, six days a week, every week. We own all of our own equipment, but nearly all of our units fall within the High UHF 600 MHz band, and replacing our functional units will be an expensive endeavor for our company, which survives solely on ticket sales. Only a few of our newer microphone/receiver sets are outside of

OREGON CABARET THEATRE, INC.

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the TV bands (ours are in the 500 MHz band), and we do not own enough to accomplish our needs at the Cabaret using only the small stock we've acquired one at a time over the last few years. All of our microphones are digital, and are able to tune to more than one frequency within the 600 MHz band, but are not able to extend outside that range. We do anticipate that, over the course of the next 5-10 years, we will need to phase out our older equipment and acquire newer units to maintain the quality of our productions, but we're hoping to do so one or two pieces at a time, rather than as a lump financial investment.

As a small independent company that does not rely on the aid of donations, replacing our entire stock of microphones is a daunting prospect. We anticipate that the cost to replace all of our current units with 500 MHz units would be close to \$10,000, which is a significant percentage of our entire yearly operating costs. Our last transition, from the 700 MHz band to the 600 MHz band, was easily as costly and difficult to accomplish.

I would urge the Commission to grant a Part 74 license if an applicant can provide certification of:

- A mission statement of providing performing arts to the public;
- A history of professional-quality wireless audio presentations to audiences without interference;
- Technical guidance and frequency coordination by qualified professionals (active in audio engineering who have academic degrees or equivalent professional experience and who are familiar with radio-frequency coordination);
- A commitment to register for protection only the frequencies, times, and locations actually needed; and
- A practice of keeping logs of all wireless microphone uses, including frequencies, for all performances.

I want to thank the Commission for seeking public comment on this extremely important issue which affects the livelihood of our company. Professional performing arts organizations and educational institutions should be able to use a reliably available frequency spectrum with interference protection. Please consider the difficulty with which the performing arts community had to transition from the 700 MHz band to the 600 MHz band; I am extremely concerned about the cost of once again updating my company's equipment in bulk. Once an investment like that is made, I would like some assurance that the sound system will work properly and without interference.

The performing arts, and the organizations that make up the performing arts community, provide a clear and demonstrable service to the public in improving quality of life, providing education, enlightenment, and entertainment, and contributing to local economies in communities across the country. I respectfully endorse the Commission's proposal to expand Part 74 LPAS rules to accommodate performing arts organizations and educational institutions that use fewer than 50 wireless microphones. The proposal is a solution that will benefit the arts community and the public, as well as emerging unlicensed white space technologies.

Sincerely,

Laura J. Judson
Production Stage Manager
Oregon Cabaret Theatre
Ashland, OR

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